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2 Nevada Bar #005065  
3 COOPER LEVENSON APRIL  
NIEDELMAN & WAGENHEIM, P.A.  
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4 Las Vegas, Nevada 89101  
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5 FAX: (702) 366-1857  
Attorneys for Defendant  
6 DESERT CAB, INC. dba DESERT CAB  
COMPANY and ODYSSEY LIMOUSINE

7  
8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA

10 THEODORE TRAPP, on his own behalf and  
on behalf of all others similarly situated,

11 Plaintiff,

12 vs.

CASE NO. 2:09-cv-00995  
DEPT NO.:

**DEMAND FOR SECURITY OF COSTS**

Date of Hearing: N/A

Time of Hearing: N/A

13 BIG POPPA'S, LLC, a Nevada limited  
liability company d/b/a BADDA BING  
14 MEN'S CLUB; SKY TOP VENDING, INC.,  
a Nevada Corporation d/b/a CAN CAN  
15 ROOM; LA FUENTE, INC., a Nevada  
corporation d/b/a CHEETAS'S; C.P. FOOD  
16 AND BEVERAGE, INC., a Nevada  
corporation d/b/a CLUB PARADISE; DÉJÀ  
17 VU SHOWGIRLS OF LAS VEGAS, LLC, a  
Nevada limited liability company d/b/a DÉJÀ  
18 VU SHOWGIRLS; PALOMINO CLUB,  
INC., a Nevada corporation d/b/a PALOMINO  
19 CLUB; SHAC, LLC, a Nevada limited  
liability company d/b/a SAPPHIRE; K-KEL,  
20 INC., a Nevada corporation d/b/a  
SPEARMINT RHINO; D2801 WESTWOOD,  
21 INC., a Nevada corporation d/b/a  
TREASURES; LITTLE DARLINGS OF LAS  
22 VEGAS, LLC, a Nevada limited liability  
company d/b/a LITTLE DARLINGS; O.G.  
23 ELIADES, A.D., LLC, a Nevada limited  
liability company d/b/a OLYMPIC  
24 GARDENS; LAS VEGAS  
ENTERTAINMENT, a Nevada limited  
25 liability company d/b/a LARRY FLYNT'S  
HUSTLER CLUB; MICHAEL A. SALTMAN  
26 d/b/a MINXX; RICK'S LAS VEGAS; FRIAS  
MANAGEMENT, LLC, a Nevada limited  
27 liability company d/b/a ACE CAB  
COMPANY and A-NORTH LAS VEGAS  
28 CAB; WESTERN CAB COMPANY, a

1 Nevada corporation d/b/a WESTERN CAB  
COMPANY and WESTERN LIMOUSINE;  
2 NEVADA CHECKER CAB  
CORPORATION, a Nevada corporation d/b/a  
3 CHECKER CAB COMPANY; NEVADA  
STAR CAB CORPORATION, a Nevada  
4 corporation d/b/a STAR CAB COMPANY;  
NEVADA YELLOW CAB CORPORATION,  
5 a Nevada corporation d/b/a YELLOW CAB  
COMPANY; LUCKY CAB COMPANY OF  
6 NEVADA, a Nevada corporation d/b/a  
LUCKY TRANS; SUN CAB, INC., a Nevada  
7 corporation d/b/a NELLIS CAB COMPANY;  
CLS NEVADA, LLC, a Nevada limited  
8 liability company d/b/a CLS  
TRANSPORTATION LAS VEGAS; ON  
9 DEMAND SEDAN SERVICES, LLC, a  
Nevada limited liability company d/b/a ODS  
10 LIMOUSINE and ODS CHAUFFEURED  
TRANSPORTATION; BLS LIMOUSINE  
11 SERVE OF LAS VEGAS; DESERT CAB,  
INC. a Nevada corporation d/b/a DESERT  
12 CAB COMPANY and ODYSSEY  
LIMOUSINE; BELL TRANS A NEVADA  
13 CORPORATION, a Nevada corporation d/b/a  
BELL TRANS; TONY CHONG, and  
14 individual; and DOE EMPLOYEES 1-1000;

15 Defendants.

16  
17 TO: THEODORE TRAPP, Plaintiff; and

18 TO: JAY EDELSON, ESQ., RAFEY S. BALABANIAN, ESQ., and JAMES E. SMYTH,  
19 ESQ., Attorneys for Plaintiff;

20 Pursuant to NRS 18.130, DESERT CAB, INC. dba DESERT CAB COMPANY and  
21 ODYSSEY LIMOUSINE hereby makes demand upon Plaintiff, who resides out of State, for security  
22 in the amount of Five Hundred and No/100 Dollars (\$500.00) for costs and charges which may be  
23 awarded herein against Plaintiff. The requirements of NRS 18.130 apply to actions in the United  
24 States

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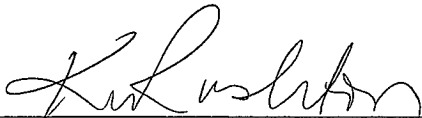
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1 District Court, District of Nevada. Truck Ins. Exchange, 683 F. Supp. 223, 227-28 (D. Nev. 1988);  
2 Hamar v. Hyatt Corp., 98 F.R.D. 305, 305-06 (D. Nev. 1983).

3  
4 Dated this 22 day of June, 2009.

5 COOPER LEVENSON APRIL  
6 NIEDELMAN & WAGENHEIM, P.A.

7  
8 By



9 Kimberly Maxson-Rushton  
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11 900 South Fourth Street  
12 Las Vegas, Nevada 89101  
13 Attorneys for Defendant  
14 DESERT CAB, INC dba DESERT CAB  
15 COPANY and ODYSSEY LIMOUSINE  
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**CERTIFICATE OF SERVICE**

Pursuant to FRCP 5 (b), I certify that I am an employee of COOPER LEVENSON APRIL NIEDELMAN & WAGENHEIM P.A. and that on this 24th day of June, 2009, I did cause a true copy of the foregoing **DEMAND FOR SECURITY OF COSTS** to be served via CM/ECF electronic filing upon the following person(s).

**Jay Edelson**

Kamber Edelson LLC  
350 N LaSalle St, Ste 1300  
Chicago, IL 60654  
312-589-6370

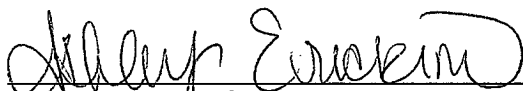
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By



An Employee of  
COOPER LEVENSON APRIL  
NIEDELMAN & WAGENHEIM, P.A.